

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>05-728</u>
v.	:	DATE FILED: December 20, 2005
JASON TYREE	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery - 1count)
	:	18 U.S.C. § 924(c)(1) (use and carrying of
	:	a firearm during a crime of violence - 1
	:	count)
	:	18 U.S.C. § § 2113 (d) (armed bank
	:	robbery - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND CHARGES THAT:

On or about February 19, 2005, in Easton, in the Eastern District of Pennsylvania,
defendant

JASON TYREE

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant TYREE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$1,000 and other items of value from employees of the 12th Street Market, located at 1201 Buskill Street in Easton, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees, of the 12th Street Market, that is, by pointing a firearm at employees and demanding money.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

_____ On or about February 19, 2005, in Easton, in the Eastern District of Pennsylvania,
defendant

JASON TYREE

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, one Tanfolio-Gardone .22 caliber revolver, serial number 67023, loaded with six live rounds of ammunition, and one Harrington and Richardson .22 caliber revolver, serial number AP60089, during an in relation to a crime of violence for which the defendant my be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THREE

THE GRAND FURTHER CHARGES THAT:___

_____On or about February 19, 2005, in Easton, in the Eastern District of Pennsylvania,
defendant

JASON TYREE

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$63,500, belonging to, and in the care, custody, control, management, and possession of the First Commonwealth Federal Credit Union, located at 825 Lehigh Street in Easton, Pennsylvania, the deposits of which were insured by the National Credit Union Administration Board, and in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the First Commonwealth Federal Credit Union, by use of a dangerous weapon, that is, a pellet gun that closely resembled a firearm and was used in a manner that created the impression that it was an actual firearm.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendant

JASON TYREE

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and ammunition involved in the commission of this offense, including, but not limited to:

- (1) one Tanfolio-Gardone .22 caliber revolver, serial number 67023, loaded with six live rounds of ammunition; and
- (2) one Harrington and Richardson .22 caliber revolver, serial number AP60089.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY